#### REMARKS

In accordance with the foregoing, the specification has been amended to correct minor typographical errors therein and the claims have been amended to clarify patentable distinctions thereof over the art of record.

No new matter is presented.

The amendments to the claims include implementing the Examiner's suggestions to overcome claim objections set forth in item 1 of the Action. The Examiner's careful attention to the claims and helpful suggestions for improving same are acknowledged and greatly appreciated.

No new matter is presented. Accordingly, approval and entry of the foregoing specification and claim amendments are respectfully requested.

## ITEM 3: REJECTION OF CLAIMS 1, 3, 12, 14, 21 AND 23 FOR ANTICIPATION UNDER 35 USC § 102(b) BY HERRON ET AL.

The rejection is respectfully traversed.

By virtue of the foregoing claim amendments, the "pair of fasteners incorporated in the connector unit..." are now specified to each comprise a "threaded shaft..." identified in Figs. 3B, 3C, 3D and 4 at 61 and 63, respectively and discussed in the specification paragraphs [0026], [0027], and et seq.

The Action at item 5, asserting rejections of the remaining claims over Herron et al. in view of Ishikawa et al., concedes that Herron does not disclose "the fasteners comprising a threaded shaft/fastener shaft projecting outwardly from a frontal surface of the detachable connector unit." (Action at page 4, item 5) Accordingly, the above claims, as now amended, patentably distinguish over Herron and the anticipation rejections of those claims, of item 3 of the Action, should be withdrawn.

# ITEM 5: REJECTION OF CLAIMS 2, 4-5, 7, 9-11, 13, 15-20, 22 AND 24 FOR OBVIOUSNESS UNDER 35 USC § 103(a) OVER HERRON ET AL. IN VIEW OF ICHIKAWA ET AL.

The rejections are respectfully traversed.

It is noted that claims 2, 4, 6, 8, 13, 15, and 24, setting forth details of the fasteners and

the threaded shafts, are now canceled since the recitations thereof have been introduced into the respective independent claims.

As noted hereinabove, the Action concedes that Herron et al. does not disclose that each of the fasteners comprises a "threaded shaft/fastener shaft projecting outwardly..." and hence relies on Ichikawa et al. for that teaching. The obviousness rejection is respectfully traversed.

Ichikawa et al. discloses an electrical connector assembly for connecting a plug 1, having a first array 52 of terminals 3, to a receptacle 35, having a second array 53 of terminals 4 to be engaged by respective ones of the terminals 3 when the plug is inserted into the receptacle.

In Ichikawa, each of the threaded pins 6 with respective guide portions 14 extends beyond the end surface 35 of the shield 36 and the first array of terminals 3. When the threaded pins 6 are engaged with the cavity 16 of the female connector, the terminals 3 of the plug connector are positioned relative to the terminals 4 of the female connector. However, the accuracy needed for positioning the terminals 3 of the plug connector relative to the terminals 4 of the female connector is higher than the accuracy needed for positioning the threaded pin 6 in the cavity 16 of the female connector. Therefore, in Ichikawa, the terminals 3 of the plug connector should be precisely and repeatedly positioned relative to the terminals 4 of the female connector. The long threaded pin 6, moreover, is apt to be bent with a slight external force.

In the present invention, a detachable connector unit is selectively connectable to an electronic apparatus such that a second connector 55 on the detachable connector unit engages a third connector 51 on the electronic apparatus--which clearly delineates the present invention from the Ichikawa et al. connector assembly.

In Ichikawa, a cable 50 having plural cable wires 51 are connected to respective ones of the terminals 3 in the first array 52. As described at col. 3, lines 34-47, the receptacle component 2 having the opposing second array 53 of electrical terminals 4 may provide connections to elements of a computer.

Contrary to the purpose of the receptacle 35 of Ichikawa et al., the detachable connector unit of the invention further comprises "a plurality of first connectors mounted in the housing affording connections to respective peripheral units. See, for example, the various different connector elements CN on the rear surface of the detachable connector unit of the invention, e.g., Figs. 2B, 3A and 3B.

In accordance with this different purpose of the present invention, the structures of the involved elements differ correspondingly from those of Ichikawa et al. Particularly, the second connector (55) is positioned relative to the third connector (51), and in that instance, the fastening shafts (63) are aligned with the corresponding mating fasteners 77 of the electronic apparatus 1. Therefore, the assembly of the present invention is easier than that of Ichikawa.

In addition, the plug connector 1 of Ichikawa is apparently not adapted for use as a connector unit for an electronic apparatus, such as a computer, in view of its axially elongated configuration. The operating portion 12 of the threaded pin 6 of Ichikawa also extends rearwardly.

In the present invention, the rear end of the fastening shaft 63 is accommodated in the main body 61 which is in turn accommodated in the recess 71 of the connector unit, with the result that the rear end of the fastening shaft 63 is accommodated within the connector unit.

### PRIMA FACIE OBVIOUSNESS OF THE COMBINATION OF ICHIKAWA AND HERRON HAS NOT BEEN SHOWN

It is respectfully submitted that the *prima facie* obviousness of the combination of the two references relied upon herein has not been shown. Ichikawa suggests that the receptacle 35 is part of a computer--and, whereas Herron discloses a computer, a number of different receptacles are supported on the back surface of the Herron computer (see, e.g., Fig. 28 in which the rear wall 24 of the chassis 20 of CPU 12 includes numerous connectors 46, 48, 25, 52, 54, 53, 55, etc. (Col. 12, lines 32-62) The front surface of the docking station 18 of Herron (Fig. 32) has mating, corresponding connectors identified by identical, but single-primed, numerals and the rear surface thereof (Fig. 33) has the same arrangement of connectors as on the back surface of the CPU, as evidenced by the identical, but doubly-primed, reference numerals. Ichikawa, when combined with Herron, would appear to substitute for the docking station 18 of Herron, the plug connector 1 of Ichikawa with a cable 50 extending therefrom--which defeats the intended purpose of the Herron docking station 18 and which is irrelevant to the claimed combination of the present invention.

The Action offers no explanation of any suggestion or incentive to modify Herron and, indeed, Ichikawa et al. refutes same, since expressly stating that its connector is for coupling a cable to a connector of a computer, as described hereinabove.

Moreover, the ground of alleged obviousness asserted in the Action, i.e., merely that "it

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would have been obvious to one of ordinary skill in the art at the time the invention was made..." has been resoundly rejected as inadequate, in accordance with MPEP 2144.03 and recent court decisions, and by the position of the USPTO as set forth in the Memorandum by Stephen G. Kunin of February 21, 2002, copy enclosed and incorporated herein.

#### CONCLUSION

In accordance with the foregoing, it respectfully submitted that the pending claims patentably distinguish over the references of record, taken singly or in any proper combination and, there being no other objections or rejections, that the application is in condition for allowance, which action is earnestly solicited.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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